	11		
1 2 3 4 5 6 7 8 9 110 111	Reza Mirzaie, Esq. (Pro Hac Vice to be submitted) rmirzaie@raklaw.com Stanley H. Thompson, Jr., Esq. (Pro Hac Vice to be submitted) sthompson@raklaw.com RUSS, AUGUST & KABAT 12424 Wilshire Boulevard, 12 th Floor Los Angeles, California 90025 Telephone: (310) 826-7474 Facsimile: (310) 826-6991 Mark Borghese, Esq. Nevada Bar No. 6231 mark@borgheselegal.com BORGHESE LEGAL, LTD. 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 T: (702) 382-0200 F: (702) 382-0212 Attorneys for Plaintiff		
12	UNITED STATES DISTRICT COURT		
13	DISTRICT OF NEVADA		
14 15	2-WAY COMPUTING, INC., a Nevada) corporation,	Case No.: 2:16-cv-00420-GMN-CWH	
16 17	Plaintiff,) v.	UNOPPOSED MOTION AND [PROPOSED] ORDER TO EXTEND DEADLINE FOR DEFENDANT TO	
18	SHORETEL, INC., a Delaware corporation,	RESPOND TO COMPLAINT	
19	Defendant.	(SECOND REQUEST)	
20	· · · · · · · · · · · · · · · · · · ·		
21	Plaintiff 2-Way Computing, Inc. ("Plaintiff")	hereby files this Unopposed Motion and	
22	[Proposed] Order to Extend Deadline for Defendant to Respond to the Complaint in accordance		
23	with LR IA 6-1 and LR IA 6-2. This is the second request to extend the proposed deadline. This		
24	request is not made after the response deadline which is currently May 15, 2016.		
25	The Complaint (Doc. 1) was filed on February 29, 2016 and was served on ShoreTel, Inc		
26	on or about March 25, 2016. A first extension to respond to the complaint was granted until May		
27	15, 2016.		
28	///		
	II		

BORGHESE LEGAL, LTD. 10161 PARK RUN DRIVE, SUITE 150 LAS VEGAS, NEVADA 89145 (702) 382-0200

Case 2:16-cv-00420-GMN-CWH Document 22 Filed 05/12/16 Page 2 of 3

Plaintiff is currently in the process of finalizing an agreement which will resolve the claims 1 2 in this litigation against Defendant. Plaintiff believes this agreement will be executed in the next few weeks and thereafter this case can be dismissed 3 4 The parties believe that the litigation of this matter will be best served by allowing an 5 additional thirty (30) days to work on a resolution of this matter. Because an attorney for 6 Defendant has not made an appearance in this case, Plaintiff files this motion to extend 7 Defendant's deadline as an unopposed motion. 8 Accordingly, Plaintiff respectfully requests that this Court grant its request to continue the 9 deadline for Defendant to respond to the Complaint until June 14, 2016. 10 BORGHESE LEGAL, LTD. 11 12 /s/ Mark Borghese 13 DATED: May 10, 2016. Mark Borghese, Esq. 14 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 15 RUSS, AUGUST & KABAT 16 Reza Mirzaie, Esq. Stanley H. Thompson, Jr., Esq. 12424 Wilshire Boulevard, 12th Floor 17 Los Angeles, California 90025 Attorneys for Plaintiff 18 19 **ORDER** 20 21 IT IS SO ORDERED. 22 UNITED STATES MAGISTRATE JUDGE 23 24 May 12, 2016 DATED: _ 25 26 27 28

1	CERTIFICA	ATE OF SERVICE
2	CERTIFICA	THE OF SERVICE
3	The undersigned hereby certifies that	a true copy of the foregoing document has been
4	served on May 10, 2016 to all counsel of record via the Court's CM/ECF system.	
5		
6	Dated: <u>May 10, 2016</u>	/s/ Mark Borghese
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		